

United States District Court

FILED
JAN 17 2007

Middle DISTRICT OF Alabama

CLERK
U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.

In the Matter of the Search of
 (Name, address or brief description of person or property to be searched)
 303 Collinwood Avenue, Montgomery, AL 36105
 (see Attachment A for more detailed description of
 residence)

APPLICATION AND AFFIDAVIT FOR SEARCH WARRANT

CASE NUMBER: 2:07mj 3-SRWI, Douglas K. Wilson being duly sworn depose and say:I am a(n) United States Postal Inspector and have reason to believe
Official Titlethat ☐ on the person of or x on the premises known as (name, description and/or location)
 303 Collinwood Avenue, Montgomery, AL 36105

in the Middle District of Alabama
 (describe the person or property) there is now concealed a certain person or property, namely
 See Attachment B

which is (give alleged grounds for search and seizure under Rule 41(b) of the Federal Rules of Criminal Procedure)
 Property that constitutes evidence of the commission of a criminal offense

in violation of Title 18 United States Code, Section(s) 1028A
 The facts to support the issuance of a Search Warrant are as follows:
 See Attached Affidavit

Continued on the attached sheet and made a part hereof.

x Yes ☐ No

Douglas K. Wilson
 Signature of Affiant

Sworn to before me, and subscribed in my presence

January 11, 2007
 Date

at Montgomery, Alabama
 City and State

SUSAN RUSS WALKER
UNITED STATES MAGISTRATE JUDGE
 Name and Title of Judicial Officer

[Signature]
 Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

The undersigned, being duly sworn on oath, deposes and says:

1. I, Douglas K. Wilson, am a Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed for over 5 months. As a Postal Inspector, I enforce federal laws relating to postal offenses. I investigate incidents where the United States Mails are used for the purpose of transporting non-mailable matter, burglaries and robberies of post offices, credit card fraud, obstruction of mail, mail theft and identity theft in violation of Title 18, United States Code, Section 1028A. The following information has been obtained by me personally or has been provided to me by other members of law enforcement, bank fraud investigators and the victims. I have completed twelve weeks of training with the United States Postal Inspection Service, which included training on identifying and investigating the crime of Identity Theft. Prior to working with the USPIS, I worked with the Hattiesburg, Mississippi, Police Department (HPD) for seven years. The last three years with HPD I served as a detective investigating numerous crimes, which included Identity Theft.
2. On November 2, 2006, Manager Jimmy Hughes (Hughes) of the Cloverland Station Post Office contacted Postal Inspector J.D. Tynan (Tynan) and informed him that mail from several different financial institutions was being delivered to 303 Collinwood Avenue. The mail was addressed to different persons/names, all with the same Collinwood address. The high volume of mail, coupled with the fact that the mail was addressed to different persons, caused Hughes and the letter carrier (postman) to become suspicious.
3. On November 3, 2006, Tynan drove to the 303 Collinwood address and observed a dark colored Dodge Intrepid with Alabama tag 3B7147M. Investigation revealed that the vehicle is registered to Andrienne Denise Stovall of 303 Collinwood Avenue, Montgomery, AL 36105.
4. On November 7, 2006, I met with Hughes and received 6 pieces of mail addressed to 303 Collinwood Avenue, Montgomery, AL 36105. The 6 pieces were addressed to 6 different names, including: McHeartland Sasser; Roberta Talley; Florence G. Santangini; and Elizabeth Fuller. Hughes also provided a list of additional names to which mail had been sent at the 303 Collinwood address. Upon receiving the list and mail, I contacted the 6 companies that had sent the mail to the Collinwood address.
5. On November 8, 2006, I spoke with Valerie Selby (Selby) who works for GE Capital Bank Fraud Department as a fraud investigator. GE Capital Bank is the financial underwriter for consumers applying for charge/credit card account(s) with WalMart Online. I requested any information held by GE Capital Bank regarding WalMart Online charge/credit card accounts with a shipping/billing address of 303 Collinwood Avenue, Montgomery, AL 36105.
6. On November 11, 2006, Selby provided a spreadsheet which showed that 29 applications for Walmart Online charge/credit card accounts, in 27 separate names, all with the Collinwood Avenue address, have been made via the internet between August 2006 and October

2006. All 29 applications were denied. All 27 names are past or present patients at Baptist Hospital. The Collinwood Avenue address was provided by the purported purchaser at the time the purchases were attempted.

7. Selby provided a copy of the personal information on Mcheartland Sasser Sr. that was used by the applicant to attempt to receive credit and to make a purchase from Wal-Mart Online. The address given was 303 Collinwood Avenue, Montgomery, AL, 36105. The application for credit was denied and the purchase was not made.

8. I made contact with the family of Mcheartland Sasser, Sr. and learned that Mr. Sasser, Sr. passed away on October 24, 2006, at Baptist Hospital. I spoke to Mrs. Sasser and Mcheartland Sasser Jr. and gathered personal information from the family such as Sasser Sr.'s date of birth and social security number. The Sasser family advised that Sasser Sr. had never lived at the 303 Collinwood Avenue address and should not be receiving mail at that location.

9. On November 8, 2006, I spoke with Cato Company (Cato) manager Lynn Feldman (Feldman). I requested any information held by Cato regarding Cato charge/credit card accounts with a shipping/billing address of 303 Collinwood Avenue, Montgomery, AL 36105. Feldman stated that 9 applications, all with different names, had been made using the 303 Collinwood Avenue address in October 2006. Only two credit card/charge account applications were processed and accounts opened: Roberta Talley and Elizabeth Fuller.

10. Feldman confirmed that Cato had issued credit to Roberta Talley at 303 Collinwood Avenue, Montgomery, AL 36105, based on an application made via the internet (account #111-0263-3682-1) on October 14, 2006. Feldman further confirmed that Cato had sent mail and merchandise (ordered via the internet) to 303 Collinwood Avenue, addressed to Roberta Talley including, but not limited to, sweaters and "playwear". Feldman stated that while some of the merchandise was shipped to 303 Collinwood Avenue, some of the merchandise was sent to a Cato store in Montgomery, Alabama for pick-up and that the individual who appeared to pick up the merchandise from the store gave an Alabama drivers license (#7021051). I determined that Alabama Driver's License #7021051 is issued in the name of Andrienne Denise Stovall of 303 Collinwood Ave, Montgomery, AL.

11. On November 13, 2006, I received a message from Douglas Talley (Talley), the son of Roberta Talley. Talley advised that his mother is in bad health and is bedridden. He also advised that she had recently been hospitalized at Baptist Hospital and has not ordered any clothing from Cato and that she should not have any mail being sent to 303 Collinwood Avenue.

12. The second Cato account was opened using the information of Elizabeth Fuller on October 19, 2006. The account (#111-0263-3696-1) has had no charges attempted.

13. On November 20, 2006, I received information that Florence G. Santangini was receiving mail at 303 Collinwood Avenue. I called and spoke to Andrew Santangini (Santangini),

the husband of Florence G. Santangini. Santangini stated that neither he nor his wife should be receiving mail at the Collinwood address. I asked if Florence had been in a hospital recently. Santangini stated that she had been at Baptist Hospital for surgery in August, 2006.

14. On November 21, 2006, I received information from Dick McGrew (McGrew), a Loss Prevention Associate, with Spiegel Brand Incorporated, the parent company of Spiegel and Newport News Co. The information showed that a Newport News charge/credit card account, opened in the name of Florence G. Santangini (account # 5856373305161676), was used to order merchandise to include, but not limited to, clothing, footwear and outerwear, to be mailed to 303 Collinwood Avenue, Montgomery, AL 36105. The merchandise was ordered via computer transaction. McGrew stated that \$613.53 worth of merchandise has been ordered on the fraudulent Santangini account and mailed to 303 Collinwood Avenue.

15. On November 27, 2006, I received information from Jason Beckerman, with Target Investigations, that 5 applications, with 5 separate names, all with 303 Collinwood Avenue, Montgomery, Alabama 36105 given as primary residence for shipping and billing purposes, were made for Target charge/credit card accounts. All applications for credit were denied.

16. On December 20, 2006, Magistrate Judge Susan Russ Walker signed a search warrant for 303 Collinwood Avenue. Before I had an opportunity to execute the warrant, a robbery and attempted sexual assault occurred at the Newton, Dale County, Alabama Post Office. As a result, the search warrant for 303 Collinwood Avenue was not executed.

17. On December 26, 2006, I spoke with the carrier supervisor at the Cloverland Station and requested that he hold all mail addressed to 303 Collinwood Avenue with names other than the residents.

18. On January 4, 2007, I received 27 pieces of mail from the Cloverland Station Post Office addressed to 303 Collinwood Avenue. The letters were mailed from various credit card companies and banks and were addressed to various names, all with the 303 Collinwood Avenue address.

19. I have subpoenaed records from Baptist Hospital and have found that 32 past/present patients' identities have been used to purchase or attempt to purchase items online based on applications with a given address of 303 Collinwood Avenue, or have had mail sent to this address, to include: McHeartland Sasser, Roberta Talley, Elizabeth Fuller, and Florence G. Santangini.

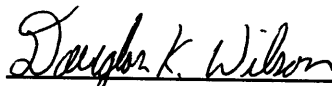
20. I have determined, through a subpoena issued to BellSouth Internet Services, that IP Address (209.149.177.67) is assigned to Baptist Medical Center South at 25 E. South Boulevard, Montgomery, AL. All 29 internet applications made to WalMart Online were made using the computer connected to this IP Address. All 9 internet applications made to Cato were

made using the computer connected to this IP Address.

21. I have contacted several victims/families and have determined that all of the victims, discovered so far, have all been patients at Baptist Hospital during or immediately preceding the openings and attempted openings of the fraudulent accounts or purchases. I have further determined that the Andrienne D. Stovall, Alabama Driver's License number #7021051, of 303 Collinwood Ave, Montgomery, AL, works at Baptist Hospital as a Phlebotomist or lab technician and, as such, has ready access to patient information such as name(s) and date(s) of birth. Further, in her capacity as a lab technician, Stovall has access to the hospital's computer system, in which patient information is stored.

22. Based on the information contained herein, and my training and experience, I know that offenders involved in fraudulent activities frequently keep documentation of their fraudulent activities, to include: assorted mail items, applications, notes, documents, letters, correspondence, checks, charge cards, merchandise, receipts, billing statements, fraudulent forms of identification and other classes of mail matter. I know that it is rare that all the names of victims are known at the time of the execution of search warrants and often other victims are identified during the search. I know that it is highly likely that items purchased with fraudulent credit cards will be in the residence, such as, in this case, items on sales receipts from Cato, Spiegel, etc. I also know that information may be stored on personal computers, discs, personal data assistants, cell phones and other electronic media.

23. Based on my training and experience and the facts set forth in this affidavit, I submit that there is probable cause to believe that fruits of the crime of Aggravated Identity Theft in violation of Title 18, United States Code, Section 1028A, are located at the residence of Andrienne Denise Stovall, 303 Collinwood Avenue, Montgomery, AL 36105.



Douglas K. Wilson, Affiant
Postal Inspector

Subscribed and sworn to before me
This 11th day of January, 2007
At Montgomery, Alabama



UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

The residence at 303 Collinwood Avenue is a single family brick home and is the first house to the left after the intersection of W. Woodland Drive. There are 3 windows on the front of the home and one wooden door. There is a utility room that is attached to the right side of the home. A chain link fence encompasses the back yard. Two older model Toyota trucks were parked in the front of the home. One was red and the other black. A black Dodge Intrepid is usually parked at the home and is what the suspect drives.

ATTACHMENT "B"

Property to be seized

1. Assorted mail items, applications, notes, documents, letters, correspondence, checks, charge cards, merchandise, receipts, billing statements, fraudulent forms of identification, and other classes of mail matter.
2. Merchandise purchased from Speigel Company and Newport News that includes but is not limited to: ~~jeans, shirts, jumpsuits, black crocodile boots, and jackets.~~ *Clothing, footwear, and outerwear.* *DW GA*
3. Merchandise purchased from Cato Fashions includes but is not limited to: sweaters and playwear.
4. Personal computer, discs, or other digital media.